

IN THE UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

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Philadelphia, PA 19107  
215-545-0008

In Re:

**Lonna L. Pfeifer**

Case No.: **20-17408**  
Chapter: **7**  
Hearing Date: **8/25/20 @ 10 AM**  
Judge: **SLM**

**MOTION TO AVOID A JUDICIAL LIEN PURSUANT TO 11 USC 522(f)**

Lonna L. Pfeifer hereinafter referred to as “Debtor” moves this Honorable Court for an Order Avoiding the Judicial Lien held by National Judgment Recovery, Inc. and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about June 10, 2020.
2. This Motion is filed pursuant to 11 USC § 522(f) to avoid and cancel a judicial lien held by Nation Judgment Recovery, Inc. on the real and personal property.
3. National Judgment Recovery, Inc. obtained a judgment against the Debtor stemming from the case Bell vs. Disner and Defendant Class of Net Winners in ZEEKREWARDS.COM, numbered 3:14-cv-0091 in the United States District Court of North Carolina. A true and correct copy of the judgment is attached hereto, incorporated herein and labeled as “**Exhibit A.**”
4. The judgment was entered and damages were assessed at \$20,169.98 in favor of Plaintiff Bell and was subsequently transferred to Nationwide Judgment Recovery, Inc.

5. At the time of filing the instant bankruptcy, the Debtor owned no real property and has a minor source of income which is used to sustain her and her elderly parents who she cares for and pays bills.

7. Under 11 U.S.C § 522 (f)(2)(A) “a lien shall be considered to impair an exemption to the extent that the sum of...(i) the lien; (ii) all other liens on the property; and (iii) the amount of the exemption that the debtor could claim if there were no liens on the property; exceeds the value that the debtor’s interest in the property would have in the absence of any liens.”

8. The aforementioned judicial lien impairs the Debtor’s exemption on her personal property, and is otherwise unsecured based on the value of the Debtor’s residence.

**WHEREFORE**, the Debtor requests an Order avoiding the judicial lien on Debtor’s residence and for such additional or alternative relief as may be just and proper.

Dated: July 27, 2020

/s/Brad J. Sadek, Esq.

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